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8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
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11 K.A.,

12 Plaintiff,

13 v.

14 MINDGEEK S.A.R.L. a foreign entity;  
15 MG FREESITES, LTD., a foreign  
entity; MINDGEEK USA  
16 INCORPORATED, a Delaware  
corporation; MG PREMIUM LTD, a  
17 foreign entity; MG GLOBAL  
ENTERTAINMENT INC., a Delaware  
18 corporation; 9219-1568 QUEBEC,  
INC., a foreign entity; BERND  
19 BERGMAIR, a foreign individual;  
FERAS ANTOON, a foreign  
20 individual; DAVID TASSILLO, a  
foreign individual; VISA INC., a  
21 Delaware corporation; REDWOOD  
CAPITAL MANAGEMENT, LLC, a  
22 Delaware limited liability company;  
23 REDWOOD DOE FUNDS 1-7;  
COLBECK CAPITAL  
24 MANAGEMENT, LLC, a Delaware  
25 limited liability company; COLBECK  
DOE FUNDS 1-3,  
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27 Defendants.  
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Case No. 2:24-cv-04786-WLH-ADS

**[PROPOSED] ORDER  
GRANTING JOINT  
STIPULATION TO REQUEST  
SUBSTITUTION OF REDWOOD  
AND COLBECK DOE FUND  
DEFENDANTS IN PLAINTIFF'S  
COMPLAINT**

1 On December 20, 2024, Plaintiff K.A. (“Plaintiff”) and Defendants MindGeek  
2 S.à r.l, MG Freesites Ltd, MindGeek USA Incorporated, MG Premium Ltd, MG  
3 Global Entertainment Inc., 9219-1568 Quebec Inc., Visa Inc., Redwood Capital  
4 Management, LLC, Colbeck Capital Management, LLC, Bernd Bergmair, Feras  
5 Antoon, and David Tassillo (collectively, “Defendants”) (collectively with Plaintiff,  
6 the “Parties”) filed a Joint Stipulation to Request Substitution of Redwood and  
7 Colbeck Doe Fund Defendants in Plaintiff’s Complaint (the “Joint Stipulation”).

8 The Court, having considered the Parties’ Joint Stipulation, and finding good  
9 cause therefor, hereby GRANTS the Joint Stipulation and ORDERS as follows:

- 10 (1) Defendants Redwood Doe Funds 1-7 in the caption and Plaintiff’s complaint  
11 shall be substituted with Redwood Master Fund, Ltd; Redwood Opportunity  
12 Master Fund, Ltd; Manuel 2018, LLC; Ginogerum, LLC; and White-  
13 Hathaway Opportunity Fund, LLC; and  
14 (2) Defendants Colbeck Doe Funds 1-3 in the caption and Plaintiff’s complaint  
15 shall be substituted with CB Media Ventures DD, LLC; CB Agency  
16 Services, LLC; and CB Participations SPV, LLC.

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18 IT IS SO ORDERED.

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20 DATED:

By: \_\_\_\_\_

21 HON. WESLEY L. HSU  
22 UNITED STATES DISTRICT JUDGE  
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